

Draft WI Applicability Test



NSR Retooling Team

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Wisconsin Department of Natural Resources



Applicability Test

- Test for determination as to whether a project will result in a significant net emissions increase, requiring NSR
- Either
 - Potential to emit - Baseline Actual Emissions
 - Projected Actual Emissions - Baseline Actual Emissions



Draft WI Baseline Actual Emissions - 1

- Baseline based upon annual average in a 24 month period occurring in the previous 10 years (5 for EUSGUs)
- Same baseline period for all pollutants
- Same pollutant baseline across multiple emissions units involved in project
- Adjusted to reflect current emission control requirements



Primary Features

- 2 in 10 baseline period
- Planned shut downs/startup. Exclude unplanned events
- Replacement Units = New Units
- 12 months of emissions data for new units
- Netting for replacement units
- 10 year projection, excluding demand unless we can clarify



Draft WI Baseline Actual Emissions - 2

- Planned shut down and start-up included in baseline, unplanned events not included
- Baseline emissions reduced for any emissions that exceeded allowable levels
- Adequate data must exist to substantiate the baseline rate



Draft WI Baseline Actual Emissions - 3

- “New” Units that are modified by a project
 - Meaning units that were constructed after the baseline period
 - If unit has not yet initially operated, baseline rate is zero
 - If operated less than two years from project commencement date, equal to PTE
 - If operated more than two years from project commencement date, then 12 months of actual emissions data is used



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- Used for plant modifications
- Not available for the construction of new emissions units or replacement emission units
- Replacement emission units may use netting, however must use “actual emissions” definition in evaluating change from emissions unit being replaced



Future Emission Estimates

- Potential to Baseline Actual Test
 - Post project reporting and record keeping minimized
- Projected Actual to Baseline Actual Test
 - 10 year projection period
 - Includes planned start-up and shut down emission rates, not unplanned events
 - Capacity of unit was capable to accommodating pre-change excluded from projection (demand adjustment) if clear guidance/rule language can not be developed



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- Notice, record keeping and reporting requirements
 - Submit notice of project prior to beginning construction either under minor NSR or under Title V revision requirements
 - Using projected actual, include details on projection
 - Report to DNR if annual emissions result in significant emissions increase and are inconsistent with projection
 - Latter not required if potential to actual test used